

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SKAGIT

Alicia VANDERWOUE, individually,  
Plaintiff,  
v.  
SAFEWAY Inc,  
Defendant.

NO.

COMPLAINT FOR PERSONAL INJURIES

I.  
PARTIES AND JURISDICTION

1. Plaintiff is a resident of Skagit County, WA.
2. Defendant is a Company residing in Skagit County by definition of the law of the State of Washington.
3. This Court is the proper venue in which to adjudicate this Complaint as shown by the facts set forth herein.
4. This Court has personal jurisdiction over the parties.

II.  
FACTS

5. On 1/12/2020, Plaintiff was injured in a fall on real property owned by Defendant. Plaintiff lawfully entered the property to patronize the commercial establishment.
6. The fall occurred in an area commonly used by Defendant's patrons.
7. Plaintiff's fall was caused by a defect in said common area which Defendant failed to attend to.
8. Plaintiff suffered injuries as a consequence of the fall, causing damages including, but not limited to, the cost of medical treatment, pain, suffering and debility.

III.

CLAIM

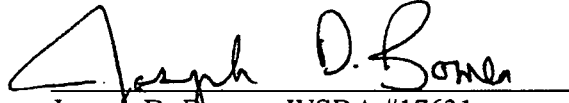
9. Defendant is liable for all damages suffered by Plaintiff because it caused the injuries described above by failing to keep its premises safe for commercial invitees.

IV.  
REQUEST FOR RELIEF

WHEREFORE Plaintiff requests a judgment of money damages in compensation for the losses alleged herein and proven at trial, together with an award of attorney's fees, costs, and such other relief as the Court deems equitable and just.

DATED THIS 14TH day of Dec., 2020.

JOSEPH D. BOWEN,  
ATTORNEY AT LAW, P.S.

  
Joseph D. Bowen, WSBA #17631  
Attorney for Plaintiff